

<b>The Eastland Park Hotel</b>	)	<b>Departmental</b>
<b>Cumberland County</b>	)	<b>Findings of Fact and Order</b>
<b>Portland, Maine</b>	)	<b>Air Emission License</b>
<b>A-170-71-E-M</b>	)	<b>Amendment #1</b>
		<b>After The Fact</b>

After review of the air emissions license amendment application, staff investigation reports and other documents in the applicant's file in the Bureau of Air Quality, pursuant to 38 M.R.S.A., Section 344 and Section 590, the Department finds the following facts:

## **I. REGISTRATION**

### **A. Introduction**

1. The Eastland Park Hotel was issued Air Emission License A-170-71-D-N on November 6, 2000, permitting the operation of emission sources associated with their Portland, Maine hotel.
2. The Eastland Park Hotel has requested an amendment of their air emissions license to reflect the removal of a currently licensed boiler (designated Boiler #2) and the installation of two smaller boiler units (designated Boilers #5 and #6).

### **B. Emission Equipment**

The Eastland Park Hotel is applying to include the operation of the following equipment to its air emissions license:

#### **Fuel Burning Equipment**

<b>Equipment</b>	<b>Maximum Capacity (MMBtu/hr)</b>	<b>Maximum Firing Rate (scf/hr)</b>	<b>Fuel Type</b>	<b>Stack #</b>
Boiler #5	1.9	1,845	Natural Gas	2
Boiler #6	1.9	1,845	Natural Gas	2

### **C. Application Classification**

A modification at a facility with a licensed emissions increase of under (4) four TPY for any one regulated pollutant and under (8) eight TPY for total pollutants is determined to be a minor revision and not a major or minor modification. This amendment is determined to be a minor revision and has been processed as such.

## **II. BEST PRACTICAL TREATMENT (BPT)**

### **A. Introduction**

In order to receive a license, the applicant must control emissions from each unit to a level considered by the Department to represent Best Practical Treatment (BPT), as defined in Chapter 100 of the Bureau of Air Quality regulations. BPT for new sources and modifications requires a demonstration that emissions are receiving Best Available Control Technology (BACT), as defined in Chapter 100 of the Air Regulations. BACT is a top-down approach to selecting air emission controls considering economic, environmental and energy impacts.

### **B. Boilers #5 and #6**

The Eastland Park Hotel is currently licensed to operate Boilers #1, #2, #3 and #4. Boilers #1 and #2 are each 8.4 MMBtu/hr boilers that fire natural gas and are utilized to satisfy the heating demands of the Hotel. Boilers #3 and #4 are each 1.44 MMBtu/hr hot water heaters utilized to satisfy the hotels hot water needs that are not fulfilled by Boilers #1 and #2.

The Eastland Park Hotel has removed Boiler #2 and replaced it with two smaller units, designated Boilers #5 and #6, with heat input capacities of 1.9 MMBtu/hr each firing natural gas. Boilers #5 and #6 are utilized to satisfy additional hot water needs of the hotel.

As previously licensed, The Eastland Park Hotel is subject to a facility wide restriction of firing no more than 82 million standard cubic feet (MMscf) of natural gas per year on a twelve-month rolling total basis. Compliance shall be based on fuel purchase records that shall include fuel receipts from the supplier showing the quantity of fuel purchased. Fuel use records shall be maintained on a monthly basis, in addition to the twelve-month rolling total.

A summary of the BACT emissions limits for Boilers #5 and #6 is as follows:

1. PM emissions are subject to Chapter 103, however BACT is stricter. BACT for PM emissions shall be an limit of no greater than 0.05 lb/MMBtu.
2. SO<sub>2</sub>, NO<sub>x</sub>, CO and VOC emission limits for natural gas fired boilers are based upon AP-42 data dated 7/98.
3. Visible emissions from the boilers are subject to Chapter 101 of the Air Regulations; however BACT is more stringent.

BACT for visible emissions from each natural gas fired boiler stack shall not to exceed 10% opacity on a 6-minute block average.

C. Annual Emission Restrictions

The Eastland Park Hotel has not applied to increase or decrease their annual fuel restrictions, therefore, because annual emissions are calculated based on fuel restrictions, this amendment does not cause any change in licensed annual emissions from The Eastland Park Hotel.

### **III.AMBIENT AIR QUALITY ANALYSIS**

According to the Maine Regulations Chapter 115, the level of air quality analyses required for a non major source shall be determined on a case-by case basis. Based on the information available in the file, and the similarity to existing sources, Maine Ambient Air Quality Standards (MAAQS) will not be violated by this source. An air quality analysis is not required for this amendment.

### **ORDER**

Based on the above Findings and subject to conditions listed below, the Department concludes that the emissions from this source:

- will receive Best Practical Treatment,
- will not violate applicable emission standards,
- will not violate applicable ambient air quality standards in conjunction with emissions from other sources.

The Department hereby grants Air Emission License Amendment A-170-71-E-M subject to the conditions found in Air Emission License A-170-71-D-N and in the following conditions:

**The following shall replace Condition (16) of Air Emission License A-170-71-D-N:**

(16) Boilers

- A. The Eastland Park Hotel is licensed to operate Boiler #1 with a heat input rate of 8.37 MMBtu/hr, Boilers #3 and #4 with heat input capacities of 1.44 MMBtu/hr each and Boilers #5 and #6 with heat input capacities of 1.9 MMBtu/hr each. [MEDEP Chapter 115, BPT]
- B. Total facility fuel use shall be limited to 82.0 MMscf of natural gas per year based on a twelve month rolling total, demonstrated through fuel use records that shall include fuel receipts from the supplier showing the quantity of fuel delivered. [MEDEP Chapter 115, BPT]
- C. Fuel use records shall be maintained on a monthly basis, in addition to the 12-month rolling total. [MEDEP Chapter 115, BPT]

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D. Emissions shall not exceed the following:

<b>Equipment</b>		<b>PM</b>	<b>PM<sub>10</sub></b>	<b>SO<sub>2</sub></b>	<b>NO<sub>x</sub></b>	<b>CO</b>	<b>VOC</b>
	lb/MMBtu	0.12	-	-	-	-	-
Boiler #1	lb/hr	1.0	1.0	0.01	0.8	0.7	0.04
Boiler #3	lb/hr	0.2	0.2	0.01	0.1	0.1	0.01
Boiler #4	lb/hr	0.2	0.2	0.01	0.1	0.1	0.01
Boiler #5	lb/hr	0.1	0.1	0.001	0.2	0.07	0.01
Boiler #6	lb/hr	0.1	0.1	0.001	0.2	0.07	0.01

[MEDEP Chapter 115, BPT]

E. Visible emissions.

Visible emissions from each natural gas fired boiler stack shall not exceed 10% opacity on a 6-minute block average. [MEDEP Chapter 101]

**The following are new conditions:**

- (20) The Eastland Park Hotel shall pay the annual air emission license fee within 30 days of February 28 of each year. Pursuant to 38 MRSA 353-A, failure to pay this annual fee in the stated timeframe is sufficient grounds for the revocation of the license under 38 MRSA 341-D, Subsection 3.
- (21) This amendment shall expire concurrently with Air Emission License A-170-71-D-N. [MEDEP Chapter 115, BPT]

DONE AND DATED IN AUGUSTA, MAINE THIS                      DAY OF                      2004.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: \_\_\_\_\_  
DAWN R. GALLAGHER, COMMISSIONER

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: **February 10, 2004**

Date of application acceptance: **February 11, 2004**

Date filed with the Board of Environmental Protection: \_\_\_\_\_

This Order prepared by, Peter G. Carleton, Bureau of Air Quality